

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF A DEPOSITION  
SUBPOENA SERVED IN:

Misc. No. \_\_\_\_\_

In re MTE Holdings LLC, *et al.*<sup>1</sup>  
pending in the United States Bankruptcy  
Court for the District of Delaware, Case No.  
19-12269(CSS)

Angelo, Gordon & Co., L.P.,

Movant

v.

MTE Holdings LLC, *et al.*

Respondent

**NOTICE OF MOTION TO QUASH  
MTE HOLDINGS LLC'S AND ITS AFFILIATE DEBTORS' DEPOSITION SUBPOENA  
DIRECTED TO ANGELO, GORDON & CO., L.P.**

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<sup>1</sup> The debtors in the chapter 11 cases pending in the United States Bankruptcy Court for the District of Delaware under Case No. 19-12269 (CSS), along with the last four digits of each debtor's federal tax identification number, are: MTE Holdings LLC ("MTE") (7894); MTE Partners LLC (1158); Olam Energy Resources I LLC (0770); MDC Energy LLC ("MDC") (9140); MDC Texas Operator LLC (1087); Ward I, LLC (6817); and MDC Reeves Energy LLC (3644) (collectively, the "Debtors"). The Debtors' address is 280 East 96th Street, Suite 210, Indianapolis, Indiana 46240.

**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 45(d)(3), and upon the concurrently filed and served Memorandum of Law and Declaration of Furqaan Siddiqui, Movant Angelo, Gordon & Co., L.P. (“Angelo Gordon”) will move this Court at the Court’s earliest available date and time, to (i) quash the deposition subpoena (“Deposition Subpoena,” attached as Exhibit 1 to the Declaration of Furqaan Siddiqui) issued in connection with the Chapter 11 cases of MTE Holdings LLC, *et al.*, pending in the United States Bankruptcy Court for the District of Delaware (Case No. 19-12269), (ii) order the reimbursement of Angelo Gordon’s costs, including counsel fees, incurred in relation to this Motion, and (iii) grant such other relief as the Court deems just and proper. Angelo Gordon respectfully requests that the Court hold oral argument on this Motion.

Dated: January 13, 2020

Respectfully submitted,

/s/ Laura W. Sawyer

Laura W. Sawyer

Genna L. Ghaul

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L.P.*